

EXHIBIT B

Maria L. Nixon

From: Molshree Gupta
Sent: Thursday, May 18, 2023 1:25 PM
To: 'Thomas Ferlauto'; Maria L. Nixon
Cc: Patrick Stockalper; Barbara Ezra
Subject: RE: Assif v County of Los Angeles; Notice of Deposition Kelly

Importance: High

Counsel:

Can you please confirm the depos or advise alternate availability? We have a lot of moving parts on our end and need to resolve these so we know the scheduling and availability for the remaining.

I am working on those today.

Thanks,

Cc: Patrick Stockalper <pstockalper@kmslegal.com>; Barbara Ezra <bezra@kmslegal.com>

Subject: RE: Assif v County of Los Angeles; Notice of Deposition Kelly

Thank you for working with us on this.

Can we at least confirm the 5/25 depo at 1 pm so we can lock it down with that witness?

I am in communication with the rest and should have those dates to you shortly.

As I previously advised, we are maintaining the objection to category #9.

Thanks,

Direct Dial 310-849-7554

25201 Paseo de Alicia, Suite 270
Laguna Hills, CA 92653
Phone: 949-334-8650
Facsimile: 949-334-8691

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Website: www.lawofficeTMF.com

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On May 16, 2023, at 12:13 PM, Maria L. Nixon <mnixon@kmslegal.com> wrote:

Dear Counsel:

Sgt. Kelly is available for his deposition on either May 26 or May 30.

Regards,

<image002.jpg>

Maria Nixon
Legal Assistant/Paralegal to
Molshree Gupta, Esq.
Carina M. Jordan, Esq.
KJAR, McKENNA & STOCKALPER, LLP
841 Apollo Street, Suite 100
El Segundo, California 90245
424-217-3026 - Main No. (Ext. 1099)
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From: Molshree Gupta <mgupta@kmslegal.com>
Sent: Tuesday, May 16, 2023 8:33 AM
To: Thomas Ferlauto <tmf@lawofficetmf.com>
Cc: Patrick Stockalper <pstockalper@kmslegal.com>; Maria L. Nixon <mnixon@kmslegal.com>
Subject: RE: Assif v County of Los Angeles
Importance: High

The County can produce the most knowledgeable witness as to the below categories on May 25, 2023 **at 1 pm in Santa Monica** :

- a) The supervision of Defendant Kelly on September 24, 2021.
- b) The investigation into Defendant Kelly's conduct in the incident that is the subject matter of this litigation and that took place on September 24, 2021.

That is the only day between 5/22 and 6/1 which works for this witness' schedule. Please advise ASAP whether this will work for you.

Thanks,
<image003.jpg>

Molshree Gupta
Partner
KJAR, McKENNA & STOCKALPER, LLP

From: Thomas Ferlauto <tmf@lawofficetmf.com>
Sent: Monday, May 15, 2023 10:28 AM
To: Molshree Gupta <mgupta@kmslegal.com>
Cc: Patrick Stockalper <pstockalper@kmslegal.com>; Maria L. Nixon <mnixon@kmslegal.com>
Subject: Re: Assif v County of Los Angeles
Importance: High

I gave you dates. May 22 through June 1.

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On May 15, 2023, at 7:44 AM, Molshree Gupta <mgupta@kmslegal.com> wrote:

Please provide dates which work for your calendar, and we will run them by the witnesses ASAP.

Thanks,

<image001.jpg>

Molshree Gupta
Partner
KJAR, McKENNA & STOCKALPER, LLP

From: Patrick Stockalper <pstockalper@kmslegal.com>
Sent: Saturday, May 13, 2023 11:24 AM
To: Thomas Ferlauto <tmf@lawofficetmf.com>
Cc: Molshree Gupta <mgupta@kmslegal.com>; Maria L. Nixon <mnixon@kmslegal.com>
Subject: RE: Assif v County of Los Angeles

That's fine. I was not jockeying for something here – just offering up another space.

<image001.jpg>

Patrick Stockalper
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From: Thomas Ferlauto <tmf@lawofficetmf.com>
Sent: Saturday, May 13, 2023 11:23 AM
To: Patrick Stockalper <pstockalper@kmslegal.com>

Cc: Molshree Gupta <mgupta@kmslegal.com>; Maria L. Nixon <mnixon@kmslegal.com>

Subject: Re: Assif v County of Los Angeles

The depositions will either be in my office or at the law office of Philip Kent Cohen (in Santa Monica) who will be associated into this case and will be trying the case with me.

Thank you

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THOMAS M. FERLAUTO
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On May 13, 2023, at 11:13 AM, Patrick Stockalper
<pstockalper@kmslegal.com> wrote:

Tom: I would think we can also do depositions in our El Segundo office.

<image001.jpg>

Patrick Stockalper
Partner
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From: Thomas Ferlauto <tmf@lawofficetmf.com>
Sent: Saturday, May 13, 2023 11:10 AM
To: Molshree Gupta <mgupta@kmslegal.com>
Cc: Maria L. Nixon <mnixon@kmslegal.com>; Patrick Stockalper <pstockalper@kmslegal.com>
Subject: Re: Assif v County of Los Angeles
Importance: High

Ms. Gupta:

Please provide dates of availability for your witnesses for in-person depositions on dates when they will not have unreasonable time constraints. As I said, we should assume a 7 hour deposition. A Zoom deposition will not be acceptable. My calendar is hectic at the moment, but I will work with you to get these depositions done in a proper manner on two separate dates between May 22 and June 1. If traveling to Orange County is an issue, we can hold the depositions at an office in Santa Monica.

Thank you,

Thomas M. Ferlauto

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On May 12, 2023, at 6:08 PM, Molshree Gupta
<mgupta@kmslegal.com> wrote:

Please see the attached court order stating the parties may choose to informally agree to take depositions beyond the discovery cut-off date.

- We suggest you proceed with the depositions of Defendants, we will provide all depo availability as it becomes available.